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T.R.A. DOCKET ROOM  
November 19, 2004

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VIA HAND DELIVERY

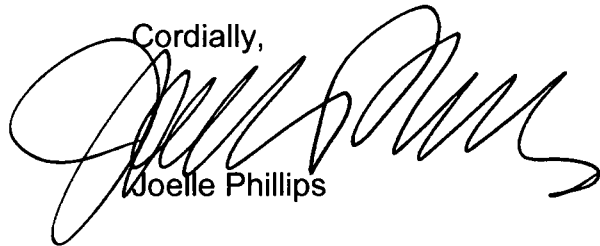
Hon Pat Miller, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Rulemaking for the Purpose of Implementing Toll-Free County-Wide  
Calling Rules*  
Docket No. 04-00205

Dear Chairman Miller:

Enclosed are the original and fourteen copies of BellSouth's *Comments* to follow up on the discussion of County Wide Calling during the recent Agenda Conference

Cordially,



Joelle Phillips

JJP:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re: *Rulemaking for the Purpose of Implementing Toll-Free County-Wide Calling Rules*

Docket No. 04-00205

**COMMENTS OF BELL SOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") files these *Comments* to follow up on the discussion of County Wide Calling during the recent Tennessee Regulatory Authority ("Authority" or "TRA") Agenda Conference.

**I. Virtual Exchanges and Exchanges**

The terms "exchange" and "rate center" are frequently used interchangeably. The term "virtual" exchange is an informal industry term, not defined in BellSouth's tariffs. These comments will address both terms.

An exchange covers a specific territory, and all customers physically located within that exchange receive telephone service from a common central office. BellSouth has established boundaries for its exchanges according to various criteria, including but not limited to natural terrain features, existing structures (roads, bridges, etc.) and network facility considerations. Exchange boundaries generally do not follow governmental or municipal boundaries such as county lines.

Carriers may assign "NPA-NXX" (an area code and prefix) numbers to a particular exchange. Carriers also populate the Local Exchange Routing Guide (LERG) to provide routing information to the industry. Specifically, the LERG tells

carriers how to route calls from their customers in one exchange to a different exchange. Local calls are routed on a carrier's local trunking and switching network, and toll calls are generally routed on a separate trunking and switching network.

The local service area for an exchange is defined in the tariff and may consist of one or more exchanges. Calls to points within the local service are generally dialed on a 7-digit basis and are treated as local calls. Billing information on local calls made by customers with flat-rate service is not recorded because BellSouth does not bill these customers for individual local calls. Calls to points outside of the local calling area are generally dialed on a 1 + 10-digit basis and are treated as toll calls. Billing information on toll calls is recorded because BellSouth rates and bills the originating customer for these calls. Toll calls are generally routed differently than local calls, in part, because of the need for this recording capability.

A customer may request a telephone number from an exchange different from the one in which he is physically located. BellSouth calls this arrangement "Foreign Exchange" (FX) service, and the rates, terms and conditions for FX service are contained in Tariff Section A9.1. Other carriers may assign numbers in a similar way for customers under terms in their tariffs, such that the customer's number is not from the exchange in which the customer is physically located.

BellSouth's tariffs refer to "theoretical" exchanges, and the term "virtual" could also be used to describe a "theoretical" exchange. A theoretical exchange is one that is served by a central office switch that is not located within that

exchange. For example, the East Sango exchange was created a number of years ago from the old Sango exchange. The Sango exchange covers an area primarily located in Montgomery County but also includes a small area located in Robertson County. With the introduction of Metro Area Calling (MAC), a need arose to provide this service to those Sango customers located in Robertson County, and BellSouth created the East Sango exchange, covering the part of the original Sango exchange located in Robertson County. However, rather than installing a new and expensive central office to serve East Sango, BellSouth simply put the new NPA-NXX code for East Sango in the Sango central office. Therefore, East Sango is a separate exchange with a unique NPA-NXX code, but is served by a central office that is not located in the East Sango exchange. This arrangement is frequently called a "theoretical" or "virtual" exchange.

During the recent oral comments presented before the TRA on County Wide Calling, some providers of internet service suggested that County Wide Calling based on "virtual" or "theoretical" exchanges was necessary and appropriate in order to provide rural users with internet service. While the industry as a whole supports both County Wide Calling and the deployment of technology throughout the states, these comments were flatly inconsistent with Tenn. Code Ann. § 65-21-114 which provides that "any call made between two (2) points in the same county in Tennessee shall be classified as toll free and shall not be billed to any customer." These providers seem to be arguing that if they assign an NPA-NXX code served by a central office in one county to an end-user in another county, that that end-user should be treated as if they were physically located in the

county in which the central office is located. In other words, these carriers want to extend toll free County-Wide Calling to people who are not physically located in the county but who have been assigned an NPA-NXX code from that county. This broadens the application of the County-Wide Calling plan of the General Assembly. To the extent that internet service providers or other carriers have based a business plan on offering toll free calling by assigning NPA-NXX codes with a TAR Code that does not actually represent the physical location of that customer, these carriers are misusing the County-Wide Calling program. The TRA Rules should not permit such a practice.

In summary, carriers are free to assign numbers from one exchange to a customer who lives outside that exchange and perhaps outside the county in which that exchange is located. The statute, however, simply does not apply based on NPA-NXX assignments. In fact, the statute refers to calls made between two points in the same county. It is therefore clear that the General Assembly intended to permit residents of a county to call other locations in that county on a toll-free basis. It was not within the contemplation of the statute that parties outside the county be treated in a similar fashion simply to advance the business plan of a particular carrier.

## **II. County-Wide Calling is Based on *Physical Location* of the Customers.**

Historically, toll-free County Wide Calling began as County-Seat Calling, which provided toll-free calling for all customers located within a county to the county seat of that county. The General Assembly later required all calls between

two points in the same county be treated as toll free in Tenn. Code Ann. § 65-21-114.

In the early 1990's, the industry held a series of meetings to discuss ways to implement toll-free County Wide Calling. Participants reached a consensus to use "TAR codes", which indicate the taxing authority for end users, based on the county in which they were physically located. BellSouth created a database containing telephone numbers and corresponding TAR codes, and members of the industry developed billing processes to identify and no-rate toll County Wide Calling calls using the TAR codes for the originating and terminating numbers. While neither the Tennessee Public Service Commission ("TPSC") nor TRA mandated any particular way for implementing toll-free County Wide Calling, both agencies were aware of the industry's approach and voiced no concerns about this method.

The name of the exchange that serves a particular customer generally does not provide enough information to determine the county in which that customer is located because, as stated above, exchange boundaries generally do not conform to county lines, and many exchanges cover more than one county. Similarly, a single TAR code cannot be assigned to an exchange because an exchange may include more than one county. Had that approach been feasible, the industry could have avoided development of the TAR code solution.

Therefore, in order to provide toll-free County Wide Calling using the TAR code, a TAR code reflecting the end user's actual physical location must be assigned to that end user's telephone number.

### III. LATA Boundary Changes

During the comments in the Rulemaking for County Wide Calling, Chairman Miller asked about the possibility of changing LATA boundaries, noting the Federal Communications Commission's ("FCC") *Memorandum and Order*, WC Docket 04-27, released April 16, 2004, to address some issues with County Wide Calling.

In his *Report on Workshop Meeting Held November 7, 2003 And Recommendation of Moderator* (TRA Docket 03-00502), Section I, Procedural History of County-Wide Calling, page 7, Director Ron Jones described events addressing the issue of interLATA toll-free County Wide Calling. In that description, Director Jones references the show-cause hearing in Docket 93-07799.

BellSouth participated in that hearing and filed testimony of witness Billie C. Greenlief on February 17, 1994. For convenience, a copy of that testimony is attached as Exhibit A. The purpose of that testimony was to support the TPSC Staff recommendation of December 10, 1993, which recommended that interexchange carriers (IXC) should continue transporting interLATA county-wide toll calls and begin zero rating them. In addition, this testimony addressed technical, administrative and regulatory issues which support that recommendation. The points contained in that testimony remain true today.

To briefly summarize this testimony, BellSouth Telecommunications, Inc. remains prohibited from transporting interLATA traffic, and any change in LATA boundaries would first require federal action, similar to the FCC's approval of SBC

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To briefly summarize this testimony, BellSouth Telecommunications, Inc. remains prohibited from transporting interLATA traffic, and any change in LATA boundaries would first require federal action, similar to the FCC's approval of SBC



Michigan's *Petition*, WC Docket No. 04-27. Obtaining this approval, however, is only the first step.

When a LATA boundary changes, BellSouth and other carriers must modify their current networks to accommodate this change. These changes include the conversion of these toll calls to local calls, customer education regarding this change and the construction of new local network facilities to handle these calls. In addition, telephone numbers would change for customers in the affected areas.

As an example, consider the sketch (attached as Exhibit B) which shows BellSouth's Rockwood exchange. This exchange is located primarily in Roane County, but also covers an area in Cumberland County. The current LATA boundary generally follows the Cumberland-Roane County line, but deviates from the county line and follows the Rockwood Exchange boundary inside Cumberland County. Presently, the entire Rockwood Exchange is part of the Knoxville LATA, and all customers in this exchange have telephone numbers with the 865 NPA. Rockwood customers have local calling to the exchanges of Concord, Halls Crossroads, Harriman, Kingston, Knoxville, Mascot-Strawberry Plains, Oliver Springs, Powell and Solway. In BellSouth's TAR database, Rockwood customers located in Roane County have the TAR code for that county while customers in Cumberland County have the TAR code for that county.

The remaining part of Cumberland County is served by an independent telephone company (ICO). As was the case in 1993, BellSouth and the ICO have no transmission facilities between Cumberland County and Rockwood across the LATA boundary.

A second sketch (attached as Exhibit C) shows the situation that would result from changing the LATA boundary to follow the Cumberland-Roane County line instead of the Rockwood exchange boundary. This change would, in effect, create a new exchange, labeled the "West Rockwood" exchange in this example. While BellSouth would continue to serve West Rockwood customers from the central office in the Rockwood exchange, the NPA for this new exchange would change from 865 to 931, and the telephone numbers of all West Rockwood subscribers would change. It is likely that, under these circumstances, a number of these customers would object to a change to their phone numbers. These new numbers would also likely trigger a request for a new thousand-number block in the 931 NPA. West Rockwood customers would retain the local calling area of Rockwood, but all local calls to other exchanges would have to be dialed on a 10-digit local basis because of the different NPA codes.

Further, BellSouth and the ICO in Cumberland County would need to modify their networks to handle the local County Wide Calling calls between West Rockwood and Cumberland County. This modification would include the construction of new transport facilities between the Rockwood central office and the ICO central office in Cumberland County for local calls between West Rockwood and Cumberland County.

The impacts described for the LATA boundary change in this example would be repeated for the 12 other similar situations that exist in Tennessee. Mr. Greenlief's testimony in **1993** provided an estimate of approximately \$2,200,000 for changes to BellSouth's network plus an additional cost of approximately

\$230,000 for related activities. However, these figures did not include any estimate of corresponding costs to ICOs for these changes. BellSouth has not updated these estimates, but given that the same network modifications would be required today as in 1993 and the fact that the number of customers affected by these changes has likely increased since 1993, it is reasonable to assume that the costs today would be more than those estimated more than ten years ago. Finally, none of these estimates addressed impacts to any of the CLECs that offer service in this area.

In summary, changing a LATA boundary to convert interLATA toll-free County Wide Calling to intraLATA local calling would require:

1. FCC approval of a LATA boundary change (the recent Michigan change required 10 months after the *Petition* was filed);
2. Creation of a new exchange;
3. New telephone numbers for the affected customers;
4. Changes to dialing instructions for local calls;
5. Construction of new network facilities by the industry; and
6. Cost recovery of costs incurred by the industry for these changes.

BellSouth does not believe that such a change would be reasonable in Tennessee at this time.

### **III. Conclusion**

For the reasons discussed above, BellSouth continues to believe that the use of an accurate TAR Code Database in which all carriers participate to ensure a correct corresponding TAR Code for each telephone number assigned to a

customer in Tennessee is essential to avoid end-user complaints regarding County Wide Calling.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

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Nashville, TN 37201-3300

615/214-6301

Charles L. Howorth, Jr  
General Counsel  
Legal

REC'D TN. PUBLIC  
SERVICE COMM.

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OFFICE OF THE  
EXECUTIVE DIRECTOR

February 17, 1994



South Central Bell

Room 356  
Green Hills Office Building  
P.O. Box 10  
Nashville, TN 37202  
615 665-6301  
FAX 615 665-6126

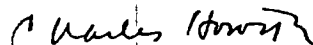
Mr. Paul Allen, Executive Director  
Tennessee Public Service Commission  
460 James Robertson Parkway  
Nashville, TN 37219

Re: *Show Cause Proceeding Against Certified IXCs to Provide  
Toll Free, County Wide Calling*  
Docket No. 93-07799

Dear Mr. Allen:

Enclosed for filing with the Commission in the above referenced docket is Testimony of Billie C. Greenlief. By copy of this letter a copy of this testimony is being mailed to the parties of record.

Very truly yours,

  
Charles L. Howorth, Jr.


CLH:gb  
Enclosure

STATE OF TENNESSEE


COUNTY OF DAVIDSON

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Billie C. Greenlief who, being by me first duly sworn deposed and said that:

He is appearing as a witness on behalf of BellSouth Telecommunications, Inc., d/b/a South Central Bell Telephone Company before the Tennessee Public Service Commission in Docket No. 93-07799, In Re: *Show Cause Proceeding Against Certified IXCs and LECs to Provide Toll Free, County Wide Calling* and if present before the Commission and duly sworn, his testimony would be set forth in the annexed testimony consisting of 14 pages and 1 exhibit .

  
Billie C. Greenlief

Sworn to and subscribed before me  
this 16<sup>th</sup> day of February, 1994.

  
NOTARY PUBLIC

My Commission Expires: My Commission Expires SEPT. 27, 1997

**TESTIMONY OF BILLIE C. GREENLIEF**  
**ON BEHALF OF**  
**BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A**  
**SOUTH CENTRAL BELL TELEPHONE COMPANY**

**Before the**

**TENNESSEE PUBLIC SERVICE COMMISSION**

**DOCKET NO. 93-07799**

**FEBRUARY 17, 1994**

1

2

3 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

4

5 A. I am Billie C. Greenlief. My business address is  
6 Room 203 Parklane Building, 5200 Maryland Way,  
7 Brentwood, Tennessee 37027.

8

9 Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

10

11 A. I am employed by BellSouth Telecommunications, Inc.  
12 D/B/A South Central Bell Telephone Company (South  
13 Central Bell) in Tennessee. I am Director, Network  
14 Planning, and my responsibilities include managing  
15 the development of deployment plans for South  
16 Central Bell's network in Tennessee.

17

18 Q. PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND  
19 AND EXPERIENCE.

20

21 A. I was first employed by South Central Bell in 1969  
22 as an engineer in the Network Traffic Engineering  
23 Department in Louisville, Kentucky. I accepted a  
24 temporary assignment at Company Headquarters in  
25 Birmingham, Alabama, in 1974 where I provided staff



1 support and conducted training classes in Traffic  
2 Engineering and Network Administration for the five  
3 South Central Bell States. In 1975, I became  
4 Manager, Network Traffic Engineering-ESS, in  
5 Louisville, Kentucky, where I supervised and  
6 provided technical support to the Network Traffic  
7 Engineering Department. In 1983, I accepted an  
8 appointment as Manager, Network Planning for  
9 Kentucky. I moved to Nashville in my present  
10 assignment in 1987.

11

12 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

13

14 A. The purpose of my testimony is to support the  
15 Tennessee Public Service Commission Staff ("Staff")  
16 recommendation dated December 10, 1993 that the  
17 Interexchange Carriers ("IXCs") should continue  
18 transporting interLATA county-wide toll calls and  
19 begin zero rating them. In addition, my testimony  
20 addresses the technical, administrative, and  
21 regulatory issues which support that  
22 recommendation.

23

24 Q. WHAT IS SOUTH CENTRAL BELL'S RECOMMENDATION ON THE  
25 DISPOSITION OF INTERLATA COUNTY-WIDE CALLS?

1

2 A. South Central Bell agrees with the Staff and the  
3 position of the Tennessee Telephone Association and  
4 recommends that the IXC's should continue  
5 transporting these calls and zero rate them.

6

7 Q. WHY SHOULD THE IXC'S HANDLE THE INTERLATA  
8 COUNTY-WIDE CALLS WITHIN THE STATE OF TENNESSEE?

9

10 A. First, IXC's are currently authorized to transport  
11 interLATA calls. Because the IXC's are transporting  
12 those calls today, there would be no changes for  
13 customers or their dialing plans, and no changes  
14 would be required in the network. A billing change  
15 is all that would be required for the IXC's to  
16 implement interLATA county-wide calling. This is  
17 the same type billing change that South Central  
18 Bell and the other LEC's implemented on September 1,  
19 1993 to handle intraLATA county-wide calling.  
20 Although this is not a simple change, the Staff  
21 proposal provided adequate time to develop and  
22 implement the required changes.

23

24 Second, the IXC's today are handling the interLATA  
25 calls associated with county-seat calling in

1 Tennessee and county-wide calling in Georgia.  
2 Until this proceeding began, we were not aware of  
3 any perceived problems that this arrangement  
4 presented.

5

6 Q. HOW DID SOUTH CENTRAL BELL IMPLEMENT INTRALATA  
7 COUNTY-WIDE CALLING?

8

9 A. South Central Bell initially looked at building a  
10 dedicated network to handle these calls. Because  
11 of the small number of subscribers affected in each  
12 county, however, that method proved far too costly.  
13 Consequently, South Central Bell developed a  
14 database that associated each telephone number  
15 within the state (both South Central Bell and other  
16 LECs) with its Tax Authority Record (TAR) code. A  
17 unique TAR code is already associated with each  
18 county and is used for billing appropriate taxes.  
19 South Central Bell and the other LECs use the  
20 database to screen intraLATA toll calls to  
21 determine which ones are intracounty. These  
22 intracounty calls are then zero rated. This  
23 screening process is mechanized within the  
24 Company's billing system.

25

1 Q. HOW OFTEN IS THE TAR CODE DATABASE UPDATED?

2

3 A. The TAR code database is updated on a daily basis  
4 for South Central Bell accounts and twice a month  
5 for accounts served by other LECs.

6

7 Q. IS THE TAR CODE DATABASE USED IN OTHER STATES IN  
8 THE BELLSOUTH REGION FOR IDENTIFYING INTRACOUNTY  
9 CALLS?

10

11 A. A similar TAR code database was first used for  
12 county-seat calling in Tennessee beginning in 1988.  
13 An expanded database was then developed for Georgia  
14 county-wide calling in 1991 and for Tennessee  
15 county-wide calling in 1993. The expanded TAR code  
16 database in Tennessee replaced the one being used  
17 for county-seat calling.

18

19 Q. IS THE TAR CODE DATABASE MADE AVAILABLE TO IXCS FOR  
20 THEIR USE IN THESE SITUATIONS?

21

22 A. Yes. The TAR code database is available to IXCs,  
23 at no charge, both for Tennessee county-seat  
24 calling and Georgia county-wide calling. AT&T is  
25 using the database in both cases. South Central

1 Bell is also willing to make the expanded database  
2 in Tennessee available to the IXC's at no charge.

3

4 Q. WOULD SOUTH CENTRAL BELL BE WILLING TO WAIVE  
5 SWITCHED ACCESS CHARGES ON THE INTERLATA  
6 COUNTY-WIDE CALLS IN THE THIRTEEN COUNTIES IN  
7 QUESTION AS STIPULATED IN THE STAFF PROPOSAL?

8

9 A. Yes.

10

11 Q. HOW DOES SOUTH CENTRAL BELL PROPOSE TO WAIVE  
12 SWITCHED ACCESS CHARGES ON THESE CALLS?

13

14 A. Presently, both with Tennessee county-seat calling  
15 and Georgia county-wide calling, the IXCs are  
16 required to track the minutes-of-use associated  
17 with calls that they zero rate, and report them on  
18 a quarterly basis in order to receive switched  
19 access charge credits. South Central Bell  
20 recommends that the same method be used for  
21 Tennessee county-wide calling.

22

23 Q. IF SOUTH CENTRAL BELL WAS ORDERED BY THE TENNESSEE  
24 PUBLIC SERVICE COMMISSION TO HANDLE THE INTERLATA  
25 COUNTY-WIDE CALLS, WHAT IMPLEMENTATION ISSUES WOULD

1           NEED TO BE ADDRESSED?

2

3    A.    Because South Central Bell is restricted by the  
4           Modified Final Judgment (MFJ) from transporting  
5           interLATA traffic, South Central Bell would first  
6           be required to apply for a MFJ waiver, with no  
7           guarantee of success.

8

9           Secondly, new facility routes would be needed to  
10          transport these interLATA calls. The construction  
11          costs associated with these new routes total  
12          approximately \$2.2 million, which includes \$0.5  
13          million in central office switch terminations, \$0.2  
14          million in facility electronics, and \$1.5 million  
15          in facility costs.

16

17          In addition, significant software changes would be  
18          required in each central office that serves  
19          customers located in one of the thirteen counties  
20          divided by a LATA boundary in order to identify  
21          these calls and properly route and record them.

22

23          In order to ensure that South Central Bell  
24          transports only interLATA intracounty calls that  
25          are to be zero rated, it is necessary to identify

1       those customers and calls uniquely with the central  
2       office software. Exhibit BCG-1 shows Cumberland,  
3       White, and Roane County in Tennessee as an example.  
4       The area 'Alpha' is the fringe area in Cumberland  
5       County served by a Roane County exchange in LATA  
6       'A'. Both Chamberland and White County are served  
7       by exchanges in LATA 'B' with area 'Delta' of  
8       Cumberland County served by a White County  
9       exchange. It is these fringe area customers in  
10      each of the thirteen counties in Tennessee that is  
11      split by a LATA boundary that would have to be  
12      identified in order to properly route interLATA  
13      intracounty calls.

14  
15   Q.   WHAT IMPLEMENTATION METHOD WOULD SOUTH CENTRAL BELL  
16       RECOMMEND IN ORDER TO CARRY THE INTERLATA CALLS IF  
17       REQUIRED BY THE COMMISSION TO DO SO?

18  
19   A.   A unique NXX code would be assigned for every  
20       fringe area involved in interLATA county-wide  
21       calling (e.g. the fringe areas of Alpha and Delta  
22       in Exhibit BCG-1). These unique NXX codes would  
23       allow interLATA county-wide calling to be  
24       identified and routed most efficiently with a  
25       minimal impact on central office switch capacity.

1        These calls would also flow through existing  
2        billing system software without generating charges  
3        to the subscriber.

4  
5        Q.        PLEASE DESCRIBE THE NETWORK ROUTING AND SOFTWARE  
6        CHANGES REQUIRED FOR SOUTH CENTRAL BELL TO HANDLE  
7        THE INTERLATA CALLS.

8  
9        A.        With any arrangement, South Central Bell would be  
10       required to establish new facility routes either  
11       through physical construction or through software  
12       routing changes. The Company has estimated that  
13       approximately 744 new trunks would be required to  
14       convert the existing network so that it can  
15       correctly identify and carry such traffic. The  
16       cost for this conversion is estimated to be  
17       approximately \$2.2 million.

18  
19       In addition, as discussed above, separate NXXs must  
20       be established, costing South Central Bell  
21       approximately \$230,000. Also, costs for network  
22       administration, translations, and industry  
23       relations will be incurred but have not yet been  
24       determined.

25



1 Q. ARE THERE PROBLEMS ASSOCIATED WITH THIS  
2 IMPLEMENTATION METHOD?

3

4 A. Yes, although this methodology is the best means  
5 for South Central Bell to provide the interLATA  
6 portion of county-wide calling, there are problems  
7 with this solution because the customers in those  
8 areas would be required to change their telephone  
9 numbers. The cost associated with number changes  
10 has not been identified. In addition, the use of  
11 the new NXX codes would unnecessarily accelerate  
12 the exhaust of the 615 area code in Tennessee, and  
13 probably could not be implemented until after the  
14 615 area code split.

15

16 Q. HAVE THERE BEEN OTHER PROPOSED SOLUTIONS PRESENTED  
17 IN THIS PROCEEDING?

18

19 A. Yes. A solution involving the use of a 10-digit  
20 screening methodology was also discussed by the  
21 Staff in its recommendation. Although, according  
22 to the Staff, the switch vendors indicated that  
23 their switches could perform this 10-digit  
24 screening, South Central Bell has not deployed  
25 10-digit screening in any central office software.

1 South Central Bell does not believe this method is  
2 reliable for this application and is uncertain as  
3 to when it effectively could be deployed.

4  
5 A 10-digit screening arrangement would require the  
6 central office switch software serving a fringe  
7 area to screen both originating and terminating  
8 telephone numbers. This screening is necessary to  
9 ensure that the subscriber making the call is  
10 located in a fringe area within the county, and  
11 that the subscriber is calling a party also located  
12 in that same county. Referring to Exhibit BCG-1, a  
13 call originating in Office Y must be screened to  
14 determine if the subscriber making the call is  
15 located in the Alpha fringe area. If that is the  
16 case, then the terminating number must also be  
17 screened by Office Y to properly route the call.  
18 Again as an example, a call originating in the  
19 Alpha fringe area to a number in Office Z must be  
20 screened by Office Y to determine if the called  
21 number is located in the Delta fringe area.

22  
23 As demonstrated in the above example, this  
24 screening arrangement requires that each central  
25 office switch serving a fringe area contain a list

1 of all telephone numbers located within that fringe  
2 area for screening originating calls. Further,  
3 each switch serving customers in that county, must  
4 maintain a list of telephone numbers for every  
5 fringe area of that county to properly screen the  
6 terminating number. Maintaining these lists will  
7 require significant effort to track service order  
8 activity and extensive communications between LECs  
9 to ensure that all appropriate service order  
10 activity is reflected in the central office switch  
11 software screening lists. Finally, the screening  
12 process and number lists will have an impact on  
13 call processing time and central office switch  
14 memory requirements. These impacts and costs will  
15 be significant, but have not been quantified.

16

17 Also, effective participation of other affected  
18 LECs would be an additional prerequisite for  
19 supporting this method.

20

21 South Central Bell is very concerned about the  
22 customer dissatisfaction which will arise with  
23 telephone number changes. However, if South  
24 Central Bell must carry the interLATA intracounty  
25 traffic, assigning new NXXs is the only method

1 discussed which will ensure the continued high  
2 service levels that the Company's customers  
3 deserve.

4

5 Q. ARE YOU AWARE OF CUSTOMER COMPLAINTS TO EITHER  
6 SOUTH CENTRAL BELL, SOUTHERN BELL, OTHER LECS OR  
7 IXC SERVICE REPRESENTATIVES DUE TO LAG TIME IN  
8 GETTING THE TAR CODE DATABASE UPDATED?

9

10 A. No, South Central Bell is not aware of any  
11 substantial number of complaints due to the lag  
12 time associated with periodic updates. As stated  
13 previously, changes in South Central Bell and  
14 Southern Bell accounts are updated daily, while the  
15 other LECS changes are updated twice a month.  
16 Therefore, there will always be a small amount of  
17 lag time. In addition, lag time in connection with  
18 updating the TAR code database is not unique to the  
19 IXCs and would continue to be present if the LECS  
20 were required to handle the interLATA calls.

21

22 Q. PLEASE SUMMARIZE SOUTH CENTRAL BELL'S POSITION ON  
23 COUNTY-WIDE CALLING.

24

25 A. South Central Bell supports the Staff's

1 recommendation that the IXC's should be required to  
2 continue transporting these interLATA toll calls  
3 and begin zero rating them at an appropriate time  
4 to be determined by the Commission. The additional  
5 network facility and administrative expenses  
6 required for South Central Bell and the other LECs  
7 to handle these calls, and the customer  
8 dissatisfaction sure to be caused by changing  
9 telephone numbers support the positions of the  
10 Staff, the Tennessee Telephone Association, and  
11 South Central Bell that the IXC's should continue to  
12 handle these calls.

13

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15

16 A. Yes it does.

17

18

19

20

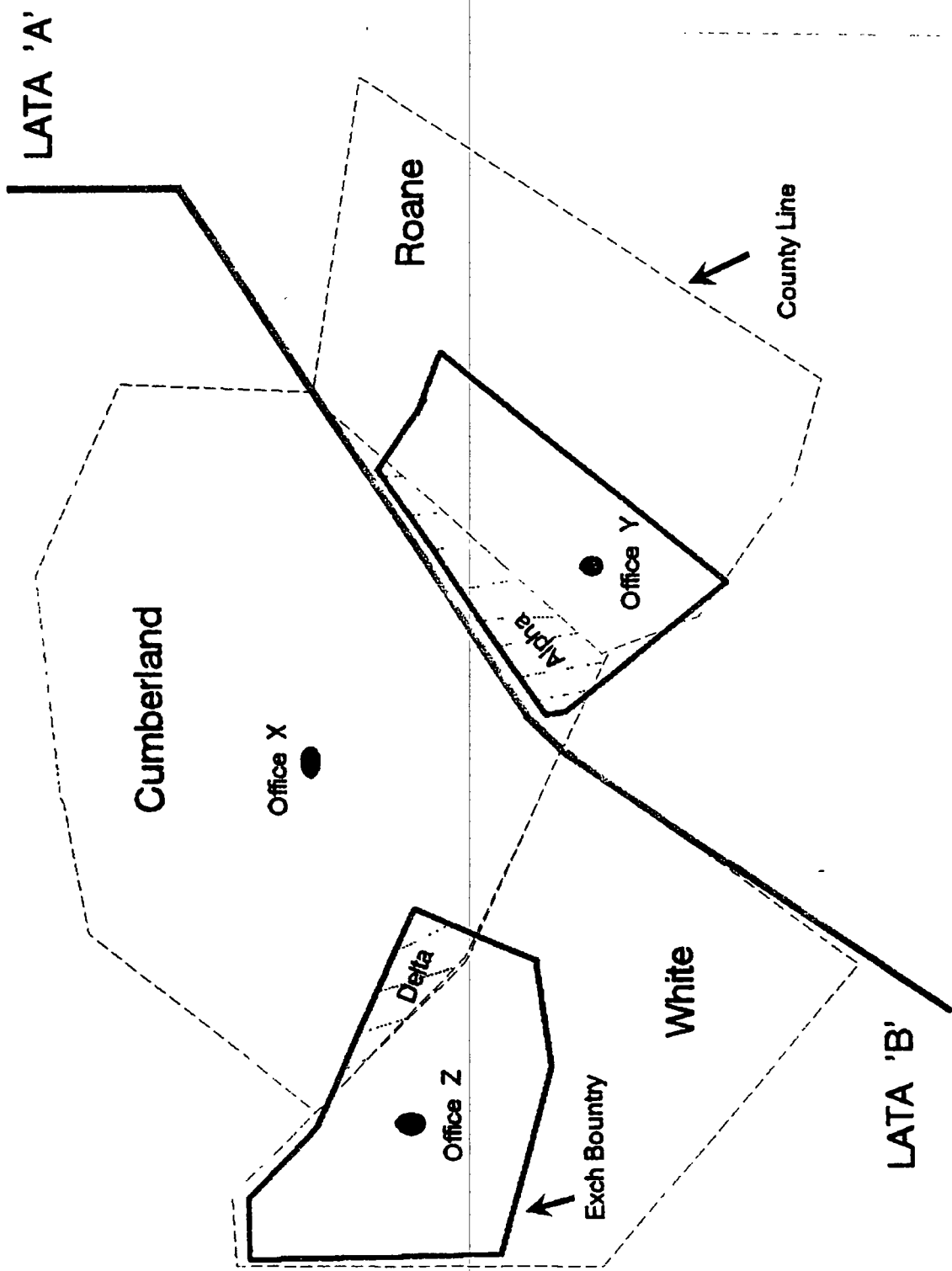
21

22

23

24

25



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Testimony of Billie C. Greenlief in Docket No. 93-07799, Show Cause Proceeding Against Certified IXCs to Provide Toll Free, County-Wide Calling has been placed in the United States Mail, postage paid, to all parties of record listed below on this 17th day of February, 1994.

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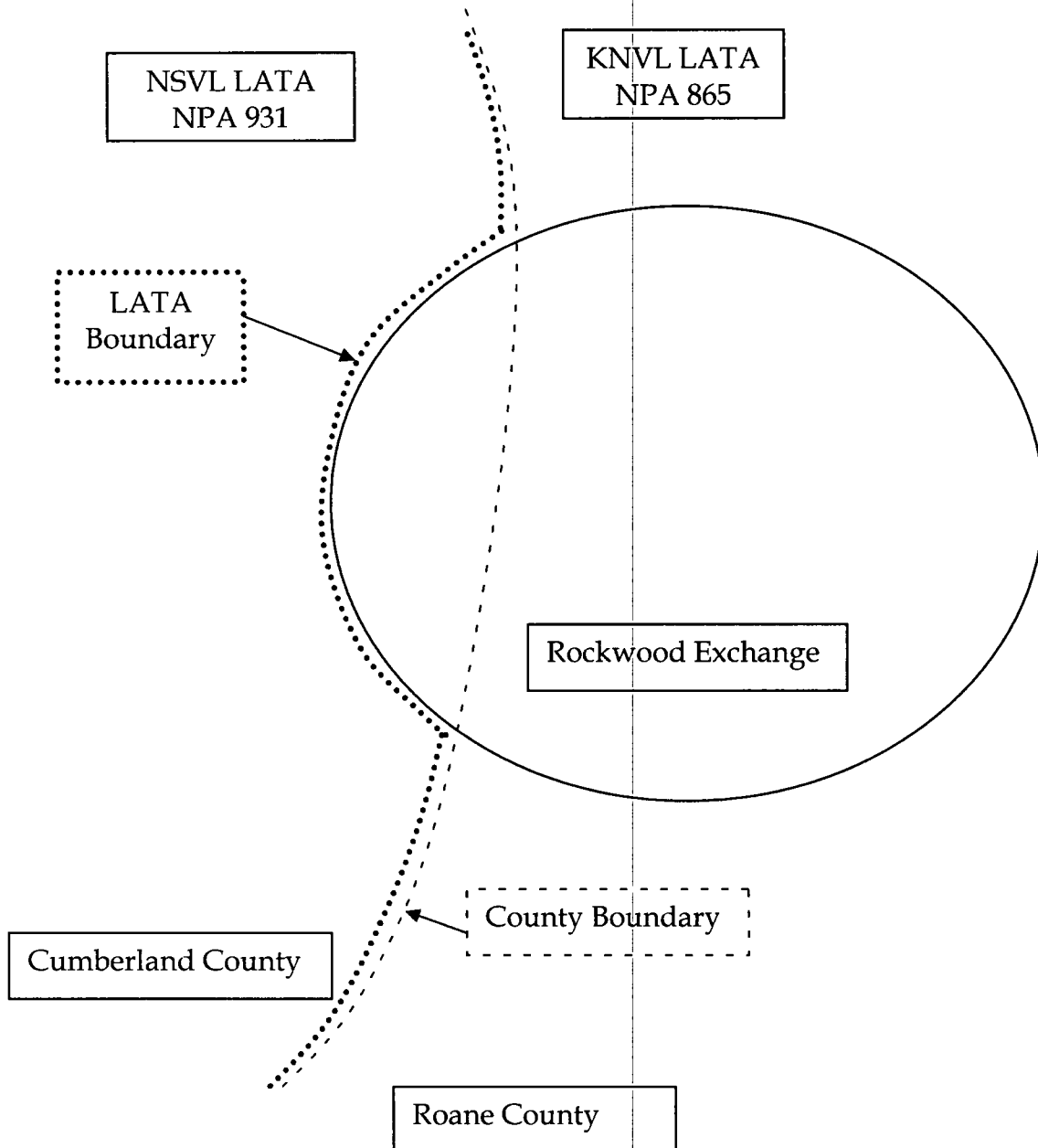
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**Exhibit B**  
**LATA Boundary Change Example**  
**Rockwood Exchange**



**Exhibit C**  
**LATA Boundary Change Example**  
**"West Rockwood" Exchange**

